

TH JUDICIAL DISTRICT

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PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Maribel Glass, by and through counsel, herby complains and alleges against the above-names Defendant, based upon knowledge, information, and reasonable belief derived therefrom, as follows:

A. DISCOVERY CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 3 pursuant Tex. R. Civ. P. 190.4.

B. JURISDICTION

2. The first cause of action is brought under Art. 1 of the Texas Constitution. Plaintiff is a citizen of Texas and is permitted to bring a private suit against a state agency seeking equitable relief for a violation of Art. 1 of the Texas Constitution.
3. The third cause of action is brought under Title IX of the Education Amendments of 1972. State courts have concurrent jurisdiction with Federal courts enforcing claims arising under Title IX.

C. VENUE

4. Venue in El Paso County is proper pursuant Tex. Civ. Prac. and Remedies Code § 15.002.

5. Venue in El Paso County is proper pursuant Tex. Civ. Prac. and Remedies Code § 65.023.

D. PARTIES

6. Defendant, Sul Ross State University is an agency of the State of Texas and an institution of higher education. Sul Ross State University may be served through its President of the University, at 79830 US-90 Alpine, Texas 79830.
7. Defendant Pete Pena Gallego is an adult individual who at all relevant times was the President of Sul Ross University. He may be served at his place of business, at 79830 US-90 Alpine, Texas 79830.
8. Defendant Board of Regents – Texas State University System, is the organization responsible for policy making and governance of Sul Ross State University. Board of Regents – Texas State University System may be served through its Office of General Counsel, at 79830 US-90 Alpine, Texas 79830.
9. Defendant Karlin DeVoll is an adult individual who at all relevant times was the Title IX Coordinator for Sul Ross University. She may be served at her place of business, at 79830 US-90 Alpine, Texas 79830
10. Defendant Brandy Snyder is an adult individual who at all relevant times was the Dean of Students at Sul Ross University. She may be served at her place of business, at 79830 US-90 Alpine, Texas 79830.
11. Defendant Kara O'Shaughnessy is an adult individual who is employed at Sul Ross University. She may be served at her place of business at 79830 US-90 Alpine, Texas 79830.

E. FACTS

12. On July 16, 2020 Sul Ross University received a complaint from Plaintiff, which included allegations of violations under Title IX, relating to exploitation and sexual harassment by Professor Ryan O'Shaughnessy.
13. On July 21, 2020 a notice of final outcomes was made, finding that Ryan O'Shaughnessy had violated the TSUS Sexual Misconduct Policy.
14. When the notice of final outcomes was made, it was only – recommended – that no communication between bet had between the Plaintiff and Ryan O'Shaughnessy.
15. Due to the trauma stemming from the sexual exploitation, sexual harassment. manipulation and deceit through the abuse of power; Plaintiff had to attend professional counseling.
16. During these counseling sessions it was urged that the Plaintiff seek closure for herself

through a letter in order to reclaim her own path forward.

17. On October 25, 2020, Plaintiff wrote and sent a closure letter to Ryan O'Shaughnessy.
18. Sul Ross State University and Kara O'Shaughnessy retaliated against the Plaintiff by having Campus Police issue a trespass warning along with a harassment and stalking warnings on November 10, 2020.

**F. FIRST CAUSES OF ACTION: VIOLATION OF THE TEXAS
CONSTITUTION ART I. BILL OF RIGHTS; §19. DUE COURSE
OF LAW**

19. Plaintiff re-alleges paragraphs 1-19 as if fully set forth herein.
20. The Texas Constitution's due course of law guarantee provides that:

No citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disfranchised, except by the due court of law of the land.
21. Students have a protected liberty interest in public education, and therefore cannot be deprived of that protected liberty interest without due course of law.
22. The terms "due course of law" and "due process of law" are without meaningful distinction. Therefore, matters of procedural due process under Texas Law typically follow federal due process interpretations.
23. Violations of the Texas Bill of Rights are enforceable through an implied private right of action against a state agency when seeking equitable relief.
24. As a result of the impending hearing where the Plaintiff has no realistic way to prevail, the Plaintiff is imminently likely to be irreparably harmed through suspension or expulsion.
25. There is no legal remedy for the harm that Plaintiff lost when suspended or expelled from campus – without – a hearing through unlawful procedures, citing the Plaintiff with a criminal trespass along with harassment and stalking warnings. The effect on the Plaintiff is far reaching and significant, affecting the Plaintiff's ultimate career options, earning potential, and community prestige in incalculable and negative ways.
26. Sul Ross State University's policy for not conducting hearings and retaliating against the Plaintiff is unconstitutional because the lack of hearing procedures failed to give the Plaintiff a meaningful opportunity to be heard at the time of need.
27. "Where important decisions turn on questions of fact, due process requires an opportunity

to confront and cross-examine adverse witnesses.”¹

28. Sul Ross State University’s lack of a hearing procedure specifically prevented Plaintiff from having the opportunity to confront and cross-examine the Complainant.
29. As a result of the forgoing, Plaintiff is entitled to damages in an amount to be determined at trial, plus prejudgment interest, attorneys’ fees, costs, and disbursements.

G. TITLE IX RETALIATION

30. Plaintiff re-alleges paragraphs 1-19 as if fully set forth herein.
31. Title IX’s regulations incorporate by reference the retaliation provision of Title IV of the Civil Rights Act of 1964.
32. Title IX makes it unlawful to retaliate against individuals.
33. Plaintiff made a complaint to Sul Ross State University under Title IX and was retaliated against by the University.
34. Plaintiff had the right to fulfill her role as a student under Title IX but was denied that right.
35. Plaintiff had the right to file a complaint under Title IX without fear of retaliation, but she was denied that right.
36. Plaintiff had the right to participate freely and honestly in any Title IX investigation without fear of reprisal, intimidation, or coercion, but she was denied this right.
37. Plaintiff had the right to challenge practices at Sul Ross State University that included sexual harassment and abuse of power but was denied that right.
38. Plaintiff was protected from retaliation pursuant to Title IX regulations that “incorporate the requirement in the Title VI regulations, which provides that “[n]o recipient or other

¹ *Goldberg v. Kelly*, 397 U.S. 254, 269 (1970)

person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by [Title VI], or because he [or she] has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under this subpart.” 34 C.F.R. § 106.71 (incorporating the retaliation language of the regulations under Title VI); 34 C.F.R § 100.7(e).

39. Plaintiff would not have been retaliated against if she not made protected complaints to Sul Ross State University, The Title XI administration.
40. By retaliating against Plaintiff’s complaints regarding Title IX, and by punishing Plaintiff for her complaint, Sul Ross State University institutionalized sex-based discrimination in direct violation of Title IX and its applicable federal regulations and guidance.
41. Sul Ross State University’s policy and practices set by the Board of Regents – Texas State for diverting Title IX complaints, investigations have institutionalized a system by which female victims of sexual exploitation and harassment are not provided equal educational opportunities on campus which violates Title IX.
42. By retaliating and undermining the Plaintiff’s Title IX complaint, the male perpetrator of sexual exploitation and harassment has been given disproportionate protections in the Title IX investigation and outcome process.
43. As a result of the forgoing, Plaintiff is entitled to damages in an amount to be determined at trial, plus prejudgment interest, attorneys’ fees, costs, and disbursements, and mental anguish.

G. CLAIMS FOR RELIEF

44. Plaintiff asks the court to enter a declaratory judgment that the Defendants investigative and/or hearing practices and policies either comply or do not comply with the law after resolution of the factual and legal issues described herein and/or presented by this controversy.
45. Plaintiff ask the court to award \$850,000 in damages.

H. PRAYER FOR RELIEF

WHEREFORE, for the forgoing reasons, Plaintiff demands judgment against the Defendant as follows:

1. Defendants be immediately enjoined from conducting any hearings that would vilate the Texas Constitution for reasons described herein.
2. Plaintiff be awarded reasonable and necessary attorney's fees and costs of court at trial and in any appeals.
3. Plaintiff be awarded prejudgment and post-judgment interest at the maximum rate allowed by law.
4. Plaintiff be awarded damages for mental anguish suffered.
5. Plaintiff be awarded such other and further relief at law or in equity to with the Plaintiff may be entitled.

Respectfully submitted,

Benjamin Law Firm
Attorney for Defendant
Tex. Bar No. 24048167
609 Myrtle Ave., Suite B
El Paso, Texas 79901
Tel: 915-412-5858
Fax: 915-503-2224

BY: /s/Brock Benjamin
BROCK BENJAMIN
Attorney for Plaintiff
Tex. Bar No. 24048167
brock@brockmorganbenjamin.com

BY: /s/Leonel Nunez, Jr.
LEONEL NUNEZ, JR.
Attorney for Plaintiff
Tex. Bar No. 24104056
leonel@brockmorganbenjamin.com

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
BRANDY SNYDER
US-90
ALPINE , TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you." **In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.**


You are hereby commanded to appear by filing a written answer to the **PLAINTIFFS ORIGINAL PETITION** at or before ten o'clock a.m. of the Monday next after the expiration of twenty (20) days after the date of service of this citation before the Honorable 394TH JUDICIAL DISTRICT COURT of BREWSTER County, Texas. Said petition was filed on **JANUARY 20TH , 2022** in this case, number **CVB22010** on the docket of said Court, and styled,

MARIBEL GLASS
VS
SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY

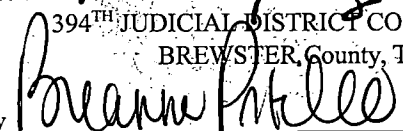
The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part **PLAINTIFFS ORIGINAL PETITION**

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this **2ND** day of **FEBRUARY, 2022**.


SARAH FELLOWS MARTINEZ District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By



Deputy

SHERIFF'S RETURN

Came to hand on the _____ day of _____, 2022, at _____ o'clock __.m., and executed on the _____ day of _____, 2022 at _____ o'clock __.m., at _____, in _____ County, _____ by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name	Day/Month/Year	Hour/Minute	Place, Course, and Distance from Court House

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
Mileage _____ miles — \$ _____
Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock __.m.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock __.m. this copy of this instrument.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
BOARD OF REGENTS- TEXAS STATE UNIVERSITY SYSTEM
OFFICE OF GENERAL COUNSEL
US-90
ALPINE , TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you." **In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.**

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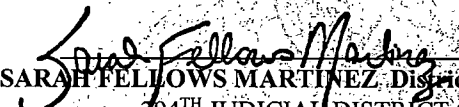
MARIBEL GLASS
VS

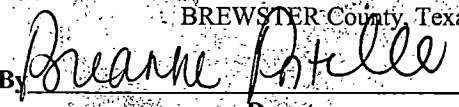
**SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY**

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part **PLAINTIFFS ORIGINAL PETITION**

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this **2ND** day of **FEBRUARY, 2022**.


SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By 
Deputy

SHERIFF'S RETURN

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_____, Sheriff
_____, County,
State of _____
By _____, Deputy

CERTIFICATE OF DELIVERY

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_____, Sheriff
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State of _____
By _____, Deputy

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
PETE GALLEGO
US-90
ALPINE, TEXAS 79830

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MARIBEL GLASS
VS

**SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY**

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The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this 2ND day of **FEBRUARY, 2022**.

Sarah Fellow Martinez
SARAH FELLOWS MARTINEZ District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Brian Pate*
Deputy

SHERIFF'S RETURN

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Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
SUL ROSS STATE UNIVERSITY
PRESIDENT PETE GALLEGOS
US-90
ALPINE , TEXAS 79830

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VS

**SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY**

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Sarah Fellow Martinez
SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Brianne Pate*
Deputy

SHERIFF'S RETURN

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REGULAR CITATION

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US-90
ALPINE, TEXAS 79830

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Sarah Fellow Martinez
SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Porciana Kelle*
Deputy

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Brewster County District Clerk
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ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

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KARA O'SHAUGHNESSY
US-90
ALPINE, TEXAS 79830

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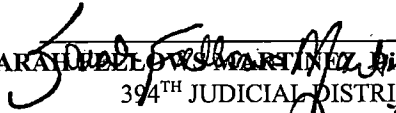
MARIBEL GLASS
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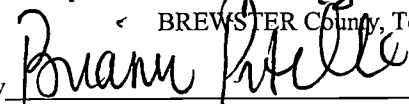
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Deputy

SHERIFF'S RETURN

Came to hand on the _____ day of _____, 2022, at _____ o'clock __.m., and executed on the _____ day of _____, 2022 at _____ o'clock __m., at _____, in _____ County, _____ by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name	Day/Month/Year	Hour/Minute	Place, Course, and Distance from Court House

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
Mileage _____ miles — \$ _____
Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock __.m.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock __.m. this copy of this instrument.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

BREWSTER COUNTY SHERIFF'S OFFICE CIVIL PROCESS SERVICE LOG

Respondent Name: KARA O'SHAUGHNESSY Docket # _____

Date Came to Hand: 3-3-22

Address: ~~110 DEER RUN RD~~
238 Sendero Horse Thief Rd

Deputy Name & No.	Date Attempted	Time Attempted	Notes
COLONA 2116	3-23-22	1450	N/C
Cruz #2110	3-23-22	1950	current resident stake indiv no longer resides here
COLONA 2116	3-28-22	1755	SERVED

FILED
At 3:36 o'clock P M

MAR 29 2022

Sarah Fellows Martinez
District Clerk, Brewster County, TX
By [Signature] Deputy

2

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
KARA O'SHAUGHNESSY
US-90
ALPINE, TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taking against you." In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby commanded to appear by filing a written answer to the PLAINTIFFS ORIGINAL PETITION at or before ten o'clock a.m. of the Monday next after the expiration of twenty (20) days after the date of service of this citation before the Honorable 394TH JUDICIAL DISTRICT COURT of BREWSTER County, Texas. Said petition was filed on JANUARY 20TH, 2022 in this case, number CVB22010 on the docket of said Court, and styled,

MARIBEL GLASS
VS

SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARDIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part PLAINTIFFS ORIGINAL PETITION.

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this 2ND day of FEBRUARY, 2022.

SARAH FELLOW MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By

Brianne Miller
Deputy

SHERIFF'S RETURN

Came to hand on the 3rd day of March, 2022, at 2 o'clock P.m., and executed on the 28 day of MARCH, 2022 at 5:55 o'clock P.m., at 238 Sendero Horse Thief Road in Brewster County, TEXAS by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name	Day/Month/Year	Hour/Minute	Place, Course, and Distance from Court House
<u>KARA O'SHAUGHNESSY</u>	<u>3/28/22</u>	<u>5:55pm</u>	<u>238 Sendero Horse Thief Road</u>

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
 Mileage — miles — \$ _____
 Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock _____m.

RONNY DODSON, Sheriff
BREWSTER County,
 State of TEXAS
 By CHRISTOPHER LYONS, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock _____m. this copy of this instrument.

_____, Sheriff
 _____ County,
 State of _____
 By _____, Deputy

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
KARLIN DEVOLL
US-90
ALPINE , TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you." In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby commanded to appear by filing a written answer to the **PLAINTIFFS ORIGINAL PETITION** at or before ten o'clock a.m. of the Monday next after the expiration of twenty (20) days after the date of service of this citation before the Honorable 394TH JUDICIAL DISTRICT COURT of BREWSTER County, Texas. Said petition was filed on **JANUARY 20TH, 2022** in this case, number **CVB22010** on the docket of said Court, and styled,

MARIBEL GLASS
VS

SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part **PLAINTIFFS ORIGINAL PETITION**.

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this **2ND** day of **FEBRUARY, 2022**.

Sarah Fellows Martinez
SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Brianna Portillo*
Deputy

SHERIFF'S RETURN

Came to hand on the 3rd day of March, 2022, at 2 o'clock P.m., and executed on the 18 day of MARCH, 2022 at 5:32 o'clock P.m., at 400 N. HARRISON, in BREWSTER County, TEXAS by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name	Day/Month/Year	Hour/Minute	Place, Course, and Distance from Court House
<u>EDLIN</u>	<u>NEVILL</u>		

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
 Mileage _____ miles — \$ _____
 Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock _____m.

Kevin Duggan, Sheriff
BREWSTER County,
 State of TEXAS
 By CHRISTOPHER CROWN, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock _____m. this copy of this instrument.

_____, Sheriff
 _____ County,
 State of _____
 By _____, Deputy

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 63089481

Status as of 3/30/2022 3:28 PM CST

Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Brock Benjamin		brock@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	SENT
Leonel Nunez		leonel@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	ERROR

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
PETE GALLEGO
US-90
ALPINE, TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you." In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby commanded to appear by filing a written answer to the **PLAINTIFFS ORIGINAL PETITION** at or before ten o'clock a.m. of the Monday next after the expiration of twenty (20) days after the date of service of this citation before the Honorable 394TH JUDICIAL DISTRICT COURT of BREWSTER County, Texas. Said petition was filed on **JANUARY 20TH, 2022** in this case, number **CVB22010** on the docket of said Court, and styled,

MARIBEL GLASS
VS

SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part **PLAINTIFFS ORIGINAL PETITION**

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this **2ND** day of **FEBRUARY, 2022**.

Sarah Fellows Martinez
SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Brianna P. Tillo*
Deputy

SHERIFF'S RETURN

Came to hand on the 3rd day of March, 2022, at 2 o'clock P.m., and executed on the 18 day of MARCH, 2022 at 5:45 o'clock PM., at 400 N. HARRISON, in BRECKENRIDGE County, TEXAS by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name Day/Month/Year Hour/Minute Place, Course, and Distance from Court House

PEPE GALLEGOS

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
Mileage _____ miles — \$ _____
Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock _____m.

RONNY JOHNSON, Sheriff
BRECKENRIDGE County,
State of TEXAS
By CHRISTOPHER COLON, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock _____m. this copy of this instrument.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 63089481

Status as of 3/30/2022 3:28 PM CST

Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Brock Benjamin		brock@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	SENT
Leonel Nunez		leonel@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	ERROR

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
BRANDY SNYDER
US-90
ALPINE , TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you." In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby commanded to appear by filing a written answer to the **PLAINTIFFS ORIGINAL PETITION** at or before ten o'clock a.m. of the Monday next after the expiration of twenty (20) days after the date of service of this citation before the Honorable 394TH JUDICIAL DISTRICT COURT of BREWSTER County, Texas. Said petition was filed on JANUARY 20TH, 2022 in this case, number CVB22010 on the docket of said Court, and styled,

MARIBEL GLASS
VS
SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part **PLAINTIFFS ORIGINAL PETITION**.

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this 2ND day of FEBRUARY, 2022.

Sarah Fellows Martinez
SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Brianna Portillo*
Deputy

SHERIFF'S RETURN

Came to hand on the 3rd day of March, 2022, at 2 o'clock P.m., and executed on the 16 day of MARCH, 2022 at 3:37 o'clock M.m., at 400 N. HARRISON in BREWSTER County, TEXAS by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name Day/Month/Year Hour/Minute Place, Course, and Distance from Court House

BRANDY GUSTAR

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
Mileage — miles — \$ _____
Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock _____ m.

Randy Dodson, Sheriff
BREWSTER County,
State of TEXAS
By CHRISTOPHER COLON, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 63089481

Status as of 3/30/2022 3:28 PM CST

Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Brock Benjamin		brock@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	SENT
Leonel Nunez		leonel@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	ERROR

Brewster County District Clerk
SARAH FELLOW MARTINEZ
P.O. BOX 1024
ALPINE, TX 79831

THE STATE OF TEXAS



REGULAR CITATION

Greetings,
SUL ROSS STATE UNIVERSITY
PRESIDENT PETE GALLEGO
US-90
ALPINE , TEXAS 79830

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you." In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

You are hereby commanded to appear by filing a written answer to the PLAINTIFFS ORIGINAL PETITION at or before ten o'clock a.m. of the Monday next after the expiration of twenty (20) days after the date of service of this citation before the Honorable 394TH JUDICIAL DISTRICT COURT of BREWSTER County, Texas. Said petition was filed on JANUARY 20TH, 2022 in this case, number CVB22010 on the docket of said Court, and styled:

MARIBEL GLASS
VS

SUL ROSS STATE UNIVERSITY, PETE GALLEGOS, BOARD OF REGENTS, KARLIN DEVOLL, BRANY SNYDER,
KARA O'SHAUGHNESSY

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Petition accompanying this citation and made a part PLAINTIFFS ORIGINAL PETITION

The officer executing this writ shall promptly serve the according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at ALPINE, Texas this 2ND day of FEBRUARY, 2022.

Sarah Fellows Martinez
SARAH FELLOWS MARTINEZ, District Clerk
394TH JUDICIAL DISTRICT COURT
BREWSTER County, Texas

By *Brianna Pirtillo*
Deputy

SHERIFF'S RETURN

Came to hand on the 3rd day of March, 2022, at 2 o'clock P.m., and executed on the 18 day of MARCH, 2022 at 2:45 o'clock A.m., at 400 N HARRISON in BREWSTER County, TEXAS by delivering to each of the within-named defendant(s), in person, a true copy of this Citation, together with the accompanying copy PLAINTIFFS ORIGINAL PETITION having first endorsed thereon the date of delivery, together with the accompanying times and places to wit:

Name Day/Month/Year Hour/Minute Place, Course, and Distance from Court House

PETE GARCIA

Not executed for the following reasons:

Information received as to the whereabouts of the said defendant(s) being

I am a disinterested person competent to make oath of the fact.

I actually and necessarily traveled _____ miles in the service of this Writ in addition to any mileage I may have traveled in the service of other process in the same case during the same trip.

FEES: Serving — cop — \$ _____
Mileage — miles — \$ _____
Total — \$ _____

Subscribed and Sworn to _____ before me, the undersigned authority, this the _____ day of _____, 2022, at _____ o'clock _____m.

Randy Pearson Sheriff
Brewster County,
State of TEXAS
By CHRISTOPHER KELSO Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____, on the _____ day of _____, 2022, at _____ o'clock _____m. this copy of this instrument.

_____, Sheriff
_____, County,
State of _____
By _____, Deputy

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 63089481

Status as of 3/30/2022 3:28 PM CST

Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Brock Benjamin		brock@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	SENT
Leonel Nunez		leonel@brockmorganbenjamin.com	3/30/2022 10:43:16 AM	ERROR

CAUSE NO. CVB22010

MARIBEL GLASS,
Plaintiff,

v.

SUL ROSS STATE UNIVERSITY, PETE
GALLEGO, BOARD OF REGENTS -
TEXAS STATE UNIVERSITY SYSTEM,
KARLIN DEVOLL, BRANDY SNYDER,
KARA O'SHAUGHNESSY
Defendants.§
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IN THE DISTRICT COURT OF

BREWSTER COUNTY, TEXAS

394TH JUDICIAL DISTRICT

**DEFENDANTS' ORIGINAL ANSWER AND DEFENSES
TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE COURT:

NOW COME Defendants Pete Gallego, Karlin Devoll, Brandy Snyder, and Kara O'Shaughnessy (the Individual Defendants), and file this Original Answer and Defenses to Plaintiff's Original Petition. The Individual Defendants respectfully show the Court the following:

I. ANSWER

The Individual Defendants hereby deny each and every allegation contained in Plaintiff's Original Petition and demand strict proof thereof.

II. DEFENSES

The Individual Defendants assert the following defenses and reserve the right to timely amend their answer to include such additional defenses throughout the course of this lawsuit:

1. The Plaintiff lacks standing to bring this suit against the Individual Defendants.
2. The Plaintiff fails to state a claim for which relief may be granted against the Individual Defendants.

3. The Individual Defendants assert the defenses of sovereign immunity from suit and sovereign immunity from liability for all claims to which these defenses apply.
4. The Individual Defendants assert the defenses of official immunity from suit and official immunity from liability for all claims to which these defenses apply.
5. The Individual Defendants assert that there were legitimate, non-retaliatory reasons for any conduct alleged in Plaintiff's Original Petition.
6. The Individual Defendants assert any and all applicable limitations on damages that may apply to this suit and the Plaintiff's claims for damages.
7. The Individual Defendants assert that Plaintiff's own acts and/or omissions caused or contributed to her injuries, if any.
8. The Individual Defendants assert that Plaintiff has failed to mitigate her damages, if any.
9. To the extent that Plaintiff's claims or filings occurred outside of the limitations period stated under the applicable provisions of law, Plaintiff's claims are barred by the applicable statute of limitations.

III. PRAYER

The Individual Defendants pray that Plaintiff take nothing by her suit, and that all costs be taxed and adjudged against Plaintiff, and that the Individual Defendants be granted such other and further relief to which they justly may be entitled.

DATED: April 7, 2022.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON
Chief, General Litigation Division



JOHN RAMSEY
Assistant Attorney General
Texas Bar No. 24051227
General Litigation Division

Office of the Attorney General
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 463-2120/Fax (512) 320-0667
john.ramsey@oag.texas.gov

**COUNSEL FOR THE
INDIVIDUAL DEFENDANTS**

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2022, a true and correct copy of the foregoing instrument has been served in accordance with Tex. R. Civ. P. 21a via the Court's electronic filing manager to:

Brock Benjamin
Leonel Nunez, Jr.
Benjamin Law Firm
609 Myrtle Ave., Suite B
El Paso, Texas 79901
brock@brockmorganbenjamin.com
leonel@brockmorganbenjamin.com

Counsel for Plaintiff



JOHN RAMSEY
Assistant Attorney General

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Patricia Cordes on behalf of John Ramsey
 Bar No. 24051227
 patricia.cordes@oag.texas.gov
 Envelope ID: 63367798
 Status as of 4/7/2022 4:26 PM CST

Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Brock Benjamin		brock@brockmorganbenjamin.com	4/7/2022 1:57:33 PM	SENT
Leonel Nunez		leonel@brockmorganbenjamin.com	4/7/2022 1:57:33 PM	ERROR

Associated Case Party: Kara O'Shaughnessy

Name	BarNumber	Email	TimestampSubmitted	Status
John Ramsey		John.Ramsey@oag.texas.gov	4/7/2022 1:57:33 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Patricia Cordes		patricia.cordes@oag.texas.gov	4/7/2022 1:57:33 PM	SENT

CAUSE NO. CVB22010

MARIBEL GLASS,
Plaintiff,

v.

SUL ROSS STATE UNIVERSITY, PETE
GALLEGO, BOARD OF REGENTS -
TEXAS STATE UNIVERSITY SYSTEM,
KARLIN DEVOLL, BRANDY SNYDER,
KARA O'SHAUGHNESSY
Defendants.§
§
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IN THE DISTRICT COURT OF

BREWSTER COUNTY, TEXAS

394TH JUDICIAL DISTRICT

**DEFENDANT BOARD OF REGENTS – TEXAS STATE UNIVERSITY SYSTEM'S
ORIGINAL ANSWER AND DEFENSES TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE COURT:

NOW COMES Defendant Board of Regents – Texas State University System (the Board of Regents), and files this Original Answer and Defenses to Plaintiff's Original Petition. The Board of Regents respectfully shows the Court the following:

I. ANSWER

The Board of Regents hereby denies each and every allegation contained in Plaintiff's Original Petition and demands strict proof thereof.

II. DEFENSES

The Board of Regents asserts the following defenses and reserves the right to timely amend its answer to include such additional defenses throughout the course of this lawsuit:

1. The Plaintiff lacks standing to bring this suit against the Board of Regents.
2. The Plaintiff fails to state a claim for which relief may be granted against the Board of Regents.

3. The Board of Regents asserts the defenses of sovereign immunity from suit and sovereign immunity from liability for all claims to which these defenses apply.
4. The Board of Regents asserts that there were legitimate, non-retaliatory reasons for any conduct alleged in Plaintiff's Original Petition.
5. The Board of Regents asserts any and all applicable limitations on damages that may apply to this suit and the Plaintiff's claims for damages.
6. The Board of Regents asserts that Plaintiff's own acts and/or omissions caused or contributed to her injuries, if any.
7. The Board of Regents asserts that Plaintiff has failed to mitigate her damages, if any.
8. To the extent that Plaintiff's claims or filings occurred outside of the limitations period stated under the applicable provisions of law, Plaintiff's claims are barred by the applicable statute of limitations.

III. PRAYER

The Board of Regents prays that Plaintiff take nothing by her suit, and that all costs be taxed and adjudged against Plaintiff, and that the Board of Regents be granted such other and further relief to which it justly may be entitled.

DATED: April 13, 2022.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON
Chief, General Litigation Division



JOHN RAMSEY
Assistant Attorney General
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2022, a true and correct copy of the foregoing instrument has been served in accordance with Tex. R. Civ. P. 21a via the Court's electronic filing manager to:

Brock Benjamin
Leonel Nunez, Jr.
Benjamin Law Firm
609 Myrtle Ave., Suite B
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brock@brockmorganbenjamin.com
leonel@brockmorganbenjamin.com

Counsel for Plaintiff



JOHN RAMSEY
Assistant Attorney General

Automated Certificate of eService

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Patricia Cordes on behalf of John Ramsey
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 patricia.cordes@oag.texas.gov
 Envelope ID: 63523762
 Status as of 4/13/2022 10:55 AM CST

Case Contacts

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Patricia Cordes		patricia.cordes@oag.texas.gov	4/13/2022 9:11:10 AM	SENT

Associated Case Party: Kara O'Shaughnessy

Name	BarNumber	Email	TimestampSubmitted	Status
John Ramsey		John.Ramsey@oag.texas.gov	4/13/2022 9:11:10 AM	SENT

Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Leonel Nunez		leonel@brockmorganbenjamin.com	4/13/2022 9:11:10 AM	ERROR
Brock Benjamin		brock@brockmorganbenjamin.com	4/13/2022 9:11:10 AM	SENT

CAUSE NO. CVB22010

MARIBEL GLASS,
Plaintiff,

v.

SUL ROSS STATE UNIVERSITY, PETE
GALLEGO, BOARD OF REGENTS -
TEXAS STATE UNIVERSITY SYSTEM,
KARLIN DEVOLL, BRANDY SNYDER,
KARA O'SHAUGHNESSY
Defendants.§
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IN THE DISTRICT COURT OF

BREWSTER COUNTY, TEXAS

394TH JUDICIAL DISTRICT

**DEFENDANT SUL ROSS STATE UNIVERSITY'S ORIGINAL ANSWER AND
DEFENSES TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE COURT:

NOW COMES Defendant Sul Ross State University (the "University"), and files this Original Answer and Defenses to Plaintiff's Original Petition. The University respectfully shows the Court the following:

I. ANSWER

The University hereby denies each and every allegation contained in Plaintiff's Original Petition and demands strict proof thereof.

II. DEFENSES

The University asserts the following defenses and reserves the right to timely amend its answer to include such additional defenses throughout the course of this lawsuit:

1. The Plaintiff lacks standing to bring this suit against the University.
2. The Plaintiff fails to state a claim for which relief may be granted against the University.

3. The University asserts the defenses of sovereign immunity from suit and sovereign immunity from liability for all claims to which these defenses apply.
4. The University asserts that there were legitimate, non-retaliatory reasons for any conduct alleged in Plaintiff's Original Petition.
5. The University asserts any and all applicable limitations on damages that may apply to this suit and the Plaintiff's claims for damages.
6. The University asserts that Plaintiff's own acts and/or omissions caused or contributed to her injuries, if any.
7. The University asserts that Plaintiff has failed to mitigate her damages, if any.
8. To the extent that Plaintiff's claims or filings occurred outside of the limitations period stated under the applicable provisions of law, Plaintiff's claims are barred by the applicable statute of limitations.

III. PRAYER

The University prays that Plaintiff take nothing by her suit, and that all costs be taxed and adjudged against Plaintiff, and that the University be granted such other and further relief to which it justly may be entitled.

DATED: April 14, 2022.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON
Chief, General Litigation Division



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leonel@brockmorganbenjamin.com

Counsel for Plaintiff



JOHN RAMSEY
Assistant Attorney General

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Associated Case Party: Maribel Glass

Name	BarNumber	Email	TimestampSubmitted	Status
Leonel Nunez		leonel@brockmorganbenjamin.com	4/14/2022 1:31:17 PM	ERROR
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